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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

93-253

Mr. David Odle  
District Manager  
Tennessee Telephone Company  
302 E. Main Street  
P.O. Box 610  
Parsons, TN 38363-0610

Dear Mr. Odle:

This responds to your letter of August 27, 1993, addressing the 2 GHz Personal Communications Services (PCS) proceeding, GEN Docket No. 90-314. Congressman Don Sundquist forwarded to the Commission your correspondence which supports a PCS licensing structure that permits small and rural telephone systems to provide PCS in their own service areas.

On September 23, 1993, the Commission adopted final rules to govern PCS as well as a Notice of Proposed Rule Making seeking comment on competitive bidding rules to be used to select PCS licensees. The Commission allocated a total of 120 megahertz of spectrum for licensed PCS and will permit most applicants to aggregate up to 40 megahertz of this spectrum. The Commission will also allow most applicants to aggregate service areas to create regional or nationwide networks. Local exchange carriers are permitted to apply for PCS licenses on the same basis as other applicants. Applicants who own twenty or more percent of a cellular company, however, are limited to 10 megahertz in a PCS service area if the cellular company serves 10 or more percent of the population of that service area.

The Commission adopted 492 local service areas based on Basic Trading Areas (BTAs) and 51 regional service areas based on Major Trading Areas (MTAs). The 120 megahertz is divided into two 30 megahertz MTA blocks, one 20 megahertz BTA block, and four 10 megahertz BTA blocks. In a companion Notice of Proposed Rule Making, PP Docket No. 93-253, the Commission proposed licensing preferences in one 20 megahertz and one 10 megahertz frequency block for rural telephone companies, small businesses, and businesses owned by minorities and women.

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Mr. David Odle

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The Commission's decisions addressing PCS are designed to foster competition among PCS providers and between PCS providers and cellular radio operators and to ensure expeditious provision of PCS in both urban and rural areas. I am attaching the press releases for the dockets addressed above that more fully describe the Commission's actions.

Sincerely,

A handwritten signature in cursive script, reading "Thomas P. Stanley". The signature is written in dark ink and is positioned above the typed name and title.

Thomas P. Stanley  
Chief Engineer

Enclosures

JOHN SUNDQUIST  
7TH DISTRICT, TENNESSEE

COMMITTEE  
WAYS AND MEANS

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Congress of the United States  
House of Representatives  
Washington, DC 20515-4207

10-8-93

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The concerns of my constituent are being  
forwarded to you for your information.  
Please respond directly to my constituent.  
Thank you for your assistance.

**TDS TELECOM**

*Tennessee  
Telephone Company*

August 27, 1993

The Honorable Don Sundquist  
U.S. House of Representatives  
339 Cannon House Office Building  
Washington, D.C. 20515-4207

Dear Representative Sundquist:

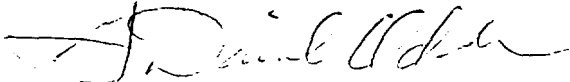
I was disturbed to hear that the Federal Communications Commission was considering limiting or precluding exchange carriers from offering PCS/PCN services.

I have written the FCC (copy attached for your information) stating my thoughts on this matter.

Please consider my views and provide any assistance that you can.

I appreciate your help in the past and I am,

Sincerely yours,



G. David Odle,  
District Manager  
TENNESSEE TELEPHONE COMPANY

GDO/rl

Attachment

**TDS TELECOM**

*Tennessee  
Telephone Company*

August 27, 1993

Mr. William Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street, N.W., 2nd Floor  
Washington, D.C. 20554

Dear Secretary Caton:

It is my understanding that the FCC is considering limiting or precluding exchange carriers from offering PCS/PCN services.

Being a rural exchange carrier, dedicated to universal service, with the technical expertise and local distribution network in place to rapidly deploy PCS, I think this limitation or exclusion is extremely unfair for us and our subscribers.

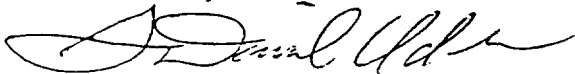
We, as exchange carriers, have demonstrated that we can work together in creating and administering a seamless network through business arrangements.

PCS would allow us to offer new radio based services to our customers, expanding and enhancing these services to rural and isolated areas, and providing them the greatest efficiency benefits from our existing and developing network infrastructure.

In this year's Budget Reconciliation Bill, the Congress mandated the FCC to ensure that small businesses and rural telephone companies be given the opportunity to participate in the provision of spectrum based services.

I urge the Commission to reconsider the exchange carrier limitations from PCS/PCN offerings.

Sincerely,



G. David Odle,  
District Manager  
TENNESSEE TELEPHONE COMPANY

GDO/rl

cc: Senator Jim Sasser  
Senator Harlan Mathews  
Representative Don Sundquist